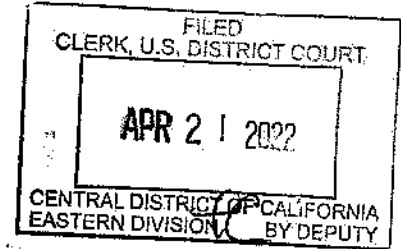


EXHIBIT 4

Redacted



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

V.R., A MINOR, AND RAMONA
TERRAZAS,

Plaintiffs,

v.

COUNTY OF SAN BERNARDINO;
GARY WHEELER; AND THUN HOUN,
Defendants.

Case No. 5:19-cv-01023-JGB-SP

Honorable Jesus G. Bernal

SPECIAL VERDICT

1 We, the jury in the above-entitled action, find the following:

2
3 **QUESTION 1:** Did either of the deputy defendants use excessive or unreasonable
4 force against Juan Ramos?

5
6 Thun Houn _____ YES _____ ☒ NO

7
8 Gary Wheeler ☒ YES _____ NO

9
10 *If you answered "yes" to Question 1 as to either deputy defendant, please*
11 *answer Question 2 for that deputy defendant. If you answered "no" to Question 1*
12 *as to both deputy defendants, please proceed to Question 4.*

13
14 **QUESTION 2:** Was the use of excessive or unreasonable force against Juan Ramos
15 by either of the deputy defendants a substantial factor in causing harm, injury,
16 damage, or death to Juan Ramos?

17
18 Thun Houn _____ YES _____ NO

19
20 Gary Wheeler ☒ YES _____ NO

21
22 *If you answered "yes" to Question 2 as to either deputy defendant, please*
23 *answer Question 3 for that deputy defendant. If you answered "no" to Question 2*
24 *as to both deputy defendants, please proceed to Question 4.*
25
26
27
28

QUESTION 3: Did any of the deputy defendants violate the Bane Act by using force against Juan Ramos?

Thun Houn _____ YES _____ NO

Gary Wheeler ✓ YES _____ NO

Please proceed to the next question.

QUESTION 4: Were either of deputy defendants negligent?

Thun Houn _____ YES ✓ NO

Gary Wheeler ✓ YES _____ NO

If you answered "no" to Question 1 or 2 for each of the deputy defendants and "no" to question 4 for both deputy defendants, answer no further questions, and sign and date the verdict form.

If you answered "yes" to either defendant on Question 4, then please proceed to Question 5 as to that deputy defendant.

QUESTION 5: Was the negligence of either of the deputy defendants a substantial factor in causing the death of Juan Ramos?

Thun Houn _____ YES ✓ NO

Gary Wheeler ✓ YES _____ NO

1
2 If you answered "no" to Question 1 or 2 for each of the deputy defendants
3 and "no" to question 5 for both deputy defendants, answer no further questions, and
4 sign and date the verdict form.

5 If you answered "yes" to either deputy defendant on Question 5, then please
6 proceed to Question 6.

7
8 **QUESTION 6:** Was Juan Ramos negligent?

9
10 ☒ YES ☐ NO

11
12 If you answered "yes" to Question 6, please answer Question 7. If you
13 answered "no" to Question 6, please proceed to Question 9.

14
15 **QUESTION 7:** Was Juan Ramos's negligence a substantial factor in causing his
16 death?

17
18 ☐ YES ☒ NO

19
20 If you answered "yes" to Question 7, please answer Question 8. If you
21 answered "no" to Question 7, please proceed to Question 9.

22
23 **QUESTION 8:** What percentage of negligence that was a cause of Juan Ramos's
24 death do you assign to the deputy defendant, and what percentage of negligence that
25 was cause of Juan Ramos's death do you assign to Juan Ramos, if any? (Your total
26 should equal 100%). Only apportion a percentage if you find that party's negligence
27 was a substantial factor in causing Juan Ramos's death.
28

Thun Houn _____ %

Gary Wheeler _____ %

Juan Ramos _____ %

Please proceed to the next question, but answer Question 9 only if you answered "yes" as to either deputy defendant on Question 2.

QUESTION 9: What are Juan Ramos's damages for his pre-death pain and suffering and loss of life?

Pre-death pain and suffering \$ 250,000

Loss of life \$ 1,750,000

Please proceed to the next Question, but only answer Question 10 if you answered "yes" as to either deputy defendant on Question 2.

QUESTION 10: Did either of the deputy defendants interfere with the Plaintiffs' right to a familial relationship with Juan Ramos?

Thun Houn _____ YES ✓ NO

Gary Wheeler ✓ YES _____ NO

1 *Proceed to Question 11 only if you answered yes to Question 2, 5 or 10 as to*
2 *either deputy defendant. Only answer Question 11 as to Ramona Terrazas if you*
3 *answered "yes" as to either deputy defendant on Question 10.*

4
5 **QUESTION 11:** What are the Plaintiffs' wrongful death damages for the loss of
6 Juan Ramos?

7
8 V.R.'s past wrongful death damages \$ 600,000

9
10 V.R.'s future wrongful death damages \$ 1,400,000

11
12 Ramona Terrazas's past wrongful death damages \$ 150,000

13
14 Ramona Terrazas's future wrongful death damages \$ 350,000

15
16 You have now completed this verdict form. Please have the foreperson date
17 and sign below.

18
19 Dated: 4/21/2022

20 
21 Presiding Juror (Foreperson)